

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

Mikayla Cheyenne Savage,

*Plaintiff,*

v.

Harris County, Texas, et al.,

*Defendants.*

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**CIVIL ACTION NO. 4:24-cv-00666**

**[PROPOSED] AGREED PROTECTIVE ORDER**

The parties have come before this Court with an agreed protective order to cover the disclosure of the home addresses of individuals named as defendants in this case. The Court enters the following Protective Order (“Protective Order”) pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. It is hereby **ORDERED** that:

Defendant Harris County has indicated it will only disclose the last-known home addresses of former employees of the Harris County Jail who are named Defendants in this action under the terms of this protective order and in response to a subpoena requesting same.

All documents, communications, or other materials containing private personal identifying information about any party to this case—including their home address—shall be treated as “Confidential-Attorneys’ Eyes Only.” The individuals who are permitted to view and know this information shall be limited to the attorneys on this case, their staff members, and vendors or contractors retained to complete service on the individual defendants in this case.

Violations of this protective order are subject to the sanction in Federal Rule of Civil Procedure 37, to be imposed by this Court.

Signed on \_\_\_\_\_, at Houston, Texas.

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Keith P. Ellison  
United States District Judge